

REMARKS/ARGUMENTS

This Amendment is being filed in response to the Final Office Action dated February 20, 2008. Reconsideration and allowance of the application in view of the amendments made above and the remarks to follow are respectfully requested.

Claims 1-20 are pending in this application.

Claims 1-12, 14, 15 and 17-20 are rejected under 35 U.S.C. §112, first paragraph for allegedly failing to comply with the written description requirement. Specifically, the Office Action alleges that "Applicant's specification fails to disclose characters and the orientation of each character within the text label remaining constant with respect to other characters in the text label." This rejection is respectfully traversed.

It is respectfully submitted that a simple review of each of Figures 1A-1F, 2A-2H, 3A-3N, 4A-4E and 5A-5K makes clear that a relative right/ left orientation of a character relative to another character within the text label remains constant in the text label as the text label is flipped such that a given first character having a given second character positioned substantially to the right, has the given second character positioned substantially to

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the right in each orientation of the text label. Language describing this feature of the present system is added to the specification by this amendment. It is respectfully submitted that no new matter is added by this amendment as this feature was well shown in each of the provided figures and described in the specification. It is respectfully submitted that the specification including the provided figures more than provides adequate support for the recitation in the claims of this feature.

Accordingly, it is respectfully submitted that claims 1-12, 14, 15 and 17-20 are in proper form and it is respectfully requested that this rejection under 35 U.S.C. §112, first paragraph, be withdrawn.

In the Office Action, Claims 1-12, 14, 15 and 17-20 are rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent No. 4,914,605 ("Loughmiller"), in view of Arakawa et al., U.S. Patent No. 5,297,051 to Arakawa, (hereinafter "Arakawa"). It is respectfully submitted that claims 1-8 are allowable over Loughmiller in view of Arakawa for at least the following reasons.

Loughmiller shows an apparatus and method for displaying a map. As is clear from even a cursory review of Figures 3A-3J, the

occurrences of whether a given character of a label is to the right or left of another given character in the label varies based on the orientation of the label. For example, as can be seen between Figures 3A and 3F, for a given character of the label "LAWRENCE" such as a character A, in Figure 3A, the character A has a character L positioned substantially to the right of the character A. However, in Figure 3F the character A of the label LAWRENCE has a character W positioned substantially to the right of the character A. Accordingly, clearly Loughmiller does not maintain the left and right relative orientation of characters in the labels in the displayed map.

Similarly, Arakawa shows a changing left and right character orientation of a label in a map display. For example, comparing Fig. 5 with Fig. 6 of Arakawa, upon a 90-degree rotation of the map, each character in the text label "ROUTE1" is relatively repositioned from Figure 5 to Figure 6. For example, for a given character of the label "ROUTE 1" such as a character R, in Figure 5, the character R has a character O positioned substantially to the right of the character R. However, in Figure 6 the character R of the label Route 1 has no character positioned substantially to

the right of the character R. Accordingly, clearly Arakawa does not maintain the left and right relative orientation of characters in the labels in the displayed map.

It is respectfully submitted that the method of claim 1 is not anticipated or made obvious by the teachings of Loughmiller in view of Arakawa. For example, Loughmiller in view of Arakawa does not disclose or suggest, a method that amongst other patentable elements, comprises (illustrative emphasis provided) "an orientation of each character within the text label remaining constant with respect to other characters in the text label as the text label is flipped such that a given first character having a given second character positioned substantially to the right, has the given second character positioned substantially to the right in each orientation of the text label" as recited in claim 1, and as substantially recited in claim 10.

In fact, in both of Loughmiller and Arakawa, the left and right orientation of characters within the labels changes as the orientation of the displayed map changes.

Based on the foregoing, the Applicant respectfully submits that independent claims 1 and 10 are patentable over Loughmiller in

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view of Arakawa and notice to this effect is earnestly solicited. Claims 2-9, 11, 12, 14, 15 and 17-20 respectively depend from one of claims 1 and 10 and accordingly are allowable for at least this reason as well as for the separately patentable elements contained in each of said claims. Accordingly, separate consideration of each of the dependent claims is respectfully requested.

In addition, Applicant denies any statement, position or averment of the Examiner that is not specifically addressed by the foregoing argument and response. Any rejections and/or points of argument not addressed would appear to be moot in view of the presented remarks. However, the Applicant reserves the right to submit further arguments in support of the above stated position, should that become necessary. No arguments are waived and none of the Examiner's statements are conceded.

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Applicant has made a diligent and sincere effort to place this application in condition for immediate allowance and notice to this effect is earnestly solicited.

Respectfully submitted,

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